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Attorneys for Defendant

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

RENE R. OBLITAS,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:17-cv-02420-JAD-VCF

**STIPULATION AND ~~PROPOSED~~ ORDER  
FOR EXTENSION OF TIME FOR  
DEFENDANT TO FILE OPPOSITION TO  
PLAINTIFF'S MOTION TO REMAND**

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have an extension of time of 7 days to file her opposition to Plaintiff's motion to remand, to be continued from February 20, 2018, to February 27, 2018.

This is the first continuance in this case sought by Defendant. There is good cause for this request. Defendant is seeking this extension due to Defendant's counsel's crowded briefing schedule with multiple deadlines on or around February 20, 2018, including briefing for an Equal Employment Opportunity Commission (EEOC) case with a voluminous record, that has been previously extended multiple times. Because of the factors described above, Defendant is requesting additional time up to

1 and including February 27, 2018, to fully review the administrative record and research the issues  
2 presented by Plaintiff's motion to remand. This request is made in good faith with no intention to  
3 unduly delay the proceedings.

4 Therefore, with this Court's approval, the Court's scheduling order shall be extended by 7 days,  
5 so that Defendant may file her opposition to Plaintiff's motion to remand on or before February 27,  
6 2018.

7  
8 Respectfully submitted,

9 Dated: February 16, 2018

LAW OFFICES OF LAWRENCE D. ROHLFING

10 /s/ Cyrus Safa

11 (as authorized via e-mail on 2/16/2018)

12 CYRUS SAFA

Attorneys for Plaintiff

13 Dated: February 16, 2018

14 STEVEN W. MYHRE

Acting United States Attorney

15 /s/ Carolyn B. Chen

16 CAROLYN B. CHEN

Special Assistant United States Attorney

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19  
20 ORDER

21 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

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23 DATED: 2-16-2018

  
24 HON. CAM FERENBACH

25 UNITED STATE MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, Carolyn B. Chen, certify that the following individuals were served with a copy of the  
3 **STIPULATION AND PROPOSED ORDER FOR EXTENSION OF TIME FOR DEFENDANT**  
4 **TO FILE OPPOSITION TO PLAINTIFF'S MOTION TO REMAND** on the date and via the  
method of service identified below:

5 CM/ECF:

6 Cyrus Safa  
7 Law Offices of Lawrence D. Rohlfing  
8 12631 E. Imperial Highway, Suite C-115  
9 Santa Fe Springs, CA 90670  
cyrus.safa@rohlflinglaw.com

10 Leonard H Stone  
11 Shook & Stone Chtd.  
12 710 S. Fourth St.  
Las Vegas, NV 89101  
lstone@shookandstone.com

13 Dated this 16th day of February 2018.

14 /s/ Carolyn B. Chen  
15 CAROLYN B. CHEN  
16 Special Assistant United States Attorney  
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